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Attorney for Secured Creditor

**UNITED STATES BANKRUPTCY COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

In re:

Elsie Romero-Coleman,  
aka Elsie Coleman  
aka Elsie F Romero  
aka Elsie Romero

Case No. 2:18-bk-15483-VZ

Chapter 13

**OBJECTION TO CONFIRMATION OF  
CHAPTER 13 PLAN**

341(a) Meeting:

Date: June 21, 2018

Time: 10:00 a.m.

Place: Room 1

915 Wilshire Boulevard, 10<sup>th</sup> Floor  
Los Angeles, CA

Confirmation Hearing:

Date: September 16, 2019

Time: 9:00 a.m.

Place: Courtroom 1368, 13<sup>th</sup> Floor  
255 East Temple Street  
Los Angeles, CA 90012

Debtor.

**TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES BANKRUPTCY COURT  
JUDGE, THE DEBTOR, DEBTOR'S COUNSEL, THE TRUSTEE, AND OTHER INTERESTED  
PARTIES:**

Wells Fargo Bank, N.A. ("Secured Creditor"), hereby objects to the confirmation of the Debtor's Chapter 13 Plan in the above-captioned matter. Secured Creditor is a party in interest as the holder of a secured claim and therefore has standing to object to the Debtor's Chapter 13 Plan. Secured Creditor objects to the Debtor's Chapter 13 Plan on the following grounds:

///



**WHEREFORE**, Secured Creditor respectfully requests that:

1. Confirmation of Debtor's Chapter 13 Plan be denied; or, in the alternative,
2. Debtor's Plan be amended in accordance with this Objection.
3. For other such relief as the Court deems just and proper.

Dated: June 20, 2018

Respectfully Submitted,  
McCalla Raymer Liebert Pierce, LLP

By: /s/ Dane W. Exnowski  
Dane W. Exnowski  
Attorney for Secured Creditor

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**1 N. Dearborn Suite 1200, Chicago, IL 60602**

A true and correct copy of the foregoing document entitled (*specify*): **OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 20, 2018**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

*U.S. Trustee*  
ustpregion16.la.ecf@usdoj.gov

*Trustee*  
Nancy K Curry (TR)  
ecfnc@trustee13.com

*Debtor's Attorney*  
John M Boyko  
jboyko@gmail.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **June 20, 2018**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

*U.S. Bankruptcy Court Judge*  
Honorable Vincent P. Zurzolo  
255 E. Temple Street, Suite 1360  
Los Angeles, CA 90012

*Debtor*  
Elsie Romero-Coleman  
221 S. Irena Ave. #A  
Redondo Beach, CA 90277

*Interested Parties*  
GCFS, Inc.,  
c/o Brighton Hushing-Kline  
5855 Capistrano Ave., Ste G.  
Atascadero, CA 93422-7201

GCFS, Inc.,  
PO Box 3470  
Paso Robles, CA 93447

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**6/20/2018**  
Date

**Maria Bahena**  
Printed Name

**/s/ Maria Bahena**  
Signature